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7

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ABDULZAHIR TURKMANI,) Case No. 2:10-cv-00711-KJD-RJJ
11)
Plaintiff,)
12)
v.)
13)
MICHAEL J. ASTRUE,)
Commissioner of Social)
14 Security,)
15)
Defendant.)
16 _____)

17 **UNOPPOSED DEFENDANTS' MOTION FOR EXTENSION OF TIME**

18 (First Request)

19 COMES NOW defendants, by and through their attorneys, Daniel
20 G. Bogden, United States Attorney for the District of Nevada, and
21 Carlos A. Gonzalez, Assistant United States Attorney, and request
22 a sixty (60) day extension of time, to file an appropriate and
23 meaningful response to Plaintiff's Request for Remand.

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26 . . .

1 Defendants' current deadline to answer plaintiffs complaint
2 is April 21, 2011. Undersigned counsel must coordinate
3 defendants appropriate response to the complaint with the Social
4 Security Office of Regional Chief Counsel in San Francisco,
5 California. At the present time that office is preparing
6 numerous answers and pleadings to be filed on litigation
7 presently pending with various District Courts in the western
8 region of the United States as well as the 9th Circuit Court of
9 Appeals. On April 4, 2011, undersigned counsel contacted Mr.
10 Marc V. Kalagian, counsel for plaintiff to inform him of the need
11 for the instant motion for an extension of time. He indicated
12 that he does not have any objections.

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1 It is therefore respectfully requested that defendants be
2 granted a sixty (60) day extension of time to file an appropriate
3 pleading to answer complaint up to and including June 20, 2011.

4 DATED this 6th day of April 2011.

5 Respectfully submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/ Carlos A. Gonzalez
9 CARLOS A. GONZALEZ
Assistant United States Attorney

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11 IT IS SO ORDERED:

12 
13 UNITED STATES MAGISTRATE JUDGE

14 DATE: April 11, 2011